

May 14, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

4235 '99 MAY 19 P3:30

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food

To Whom It May Concern:

The FDA should retain the current labeling law, the current terminology of "treated with irradiation" or "irradiated" and the use of the radura symbol on all irradiated foods. The label should be large enough to be readily visible to the consumer and should be placed on the front of the package. The label contains important information regarding the processing of the contents and therefore deserves a prominent place on the packaging. For unpackaged whole foods such as produce, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like any other label, irradiation labels are required by the FDA to be truthful, not misleading. I believe that the alternative terms "electronic pasteurization" or "cold pasteurization" are misleading because pasteurization is an entirely different process of heating and cooling.

In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of food and therefore should be disclosed. The material fact remains, therefore the labeling requirement should remain. Irradiation alters the nutrients in food, causes changes in sensory and storage characteristics, and causes chemical changes in food that may be hazardous. Consumers have a right to know if this process has been used on their food.

The requirement of irradiation exposure should not expire. If some consumers become familiar with the radura, there will always be new consumers, young people, immigrants, entering the marketplace who will not be. Also, because of the newness of the technology and the need to assess the public health effects of ingesting irradiated foods, I believe the FDA's labeling requirements should not be permitted to expire.

I urge you to place the comments received on the Internet so that the public can be informed about who is participating in this comment process.

Sincerely,



Marcella Theeman

Cc: Representative Jim Kolbe
Senator Jon Kyl
Senator John McCain

98N-1038

C 2455